## REMARKS/ARGUMENTS

Claims 1-2, 4, 6, 8-10, 13-16, 18, 38, 59, 77-102 are pending in the application.

### *Formal Amendment*

Various claims have been amended to provide letters for the sub-paragraphs without changing the scope of the claims.

### *Claim Rejections under 35 USC §112*

The Examiner at page 2 of the Office Action has rejected Claims 1, 2, 4, 6, 8-10, 13-16, 18, 38, 59, 77-102 under Section 35 USC § 112. Claims 1, 38, and 59 have been amended to obviate the bases of rejection. Claims 1, 38, and 59 have been amended to include the definition of the terms "members," "reviewer," and "expert." The use of the foregoing terms in Claims 1, 38, and 59 find support in the specifications as follows.

A "member" is defined as any person who belongs to at least one community and uses the knowledge management system (Figures 3.1, 4.2, 5.3). ¶ [0025] of the present published application US 2006/0277091 A1 to Kochikar et al. (hereinafter "Kochikar"). A "member" further denotes a person associated with a knowledge community for the purposes of obtaining benefits of various kinds from the collective knowledge of the community. ¶ [002] of Kochikar. A "reviewer" is a member of a community who is assigned to provide opinions, comments, reviews and assessments, including ratings of the quality of knowledge assets of various types in the area of expertise. ¶¶ [0057] and [0059], and Figures 3.10, 3.11, 9.5, 9.6 and 9.7 of Kochikar. An "expert" is a member who has special knowledge or skills in an area of specialization. ¶ [0082] of Kochikar.

Accordingly the foregoing rejection should be withdrawn.

### *Claim Rejections under 35 USC §103 over prior art*

The Examiner has rejected Claims 1, 2, 4, 10, 13, 14-16, 18, 77-82, 103, 38, 83, 84, 87-93, 59, 94, 98-102 under 35 USC §103(a) as being unpatentable over USP 6,275,811 to Ginn (hereinafter "Ginn"). Applicant traverses the rejections for the following reasons.

**General Differences between the Claimed Method and Ginn's Method**

As the Field of the Invention states:

> The present invention pertains in general to knowledge management in collaborative knowledge sharing communities; it refers to a management system for determining the benefits of knowledge sharing in such communities and providing incentives in return for the contribution made to the community.

Knowledge assets may be catalogued by multiple factors, such as shown in present Fig. 2. Fig. 2 shows a multi-dimensional knowledge hierarchy for a knowledge asset, such as Content Types 2.1, Target Audience 2.2, Document Format 2.3, and Knowledge Areas 2.4. As taught by Kochikar at ¶ [0052] according to a preferred embodiment: "Knowledge areas are classified into a four-level hierarchy." Such a knowledge hierarchy can encompass many varieties of knowledge

In contrast, Ginn concerns "an interactive electronic communication environment in which users exchange electronic messages." Ginn, Claim 1, preamble. Messages are reviewed for appropriateness (Ginn Claim 1, lines 49-54), and are posted based upon an appropriateness rating (Ginn Claim 1, lines 63-64).

As can be appreciated, Ginn's knowledge assets are far more restricted in type than is possible with the presently claimed knowledge assets. Further, as shown below, partly due to the cataloguing of knowledge assets against a multi-dimensional knowledge hierarchy, including the dimension of knowledge areas, the presently claimed invention allows for far more intricate collaboration among the members than is possible with Ginn's method.

**Members of Community**

Claim 1-a has been amended to recite the step of "admitting a member into a community or sub-community based on his or her interest to be in said community or sub-community." Similar amendments appear in Claim 38-a and 59-a. This recitation is supported in Kochikar at the following points:

> ¶ [0020], for instance, that teaches, "organizing a set of communities against a multi-dimensional knowledge hierarchy."
>
> ¶ [0002] teaches (1) "In general, communities can be envisioned as being structured in a hierarchical form, comprising sub-communities with different and

specific foci * * *"; and (2) "* * * or in a community that is formed for the specific purpose of sharing knowledge in an area of interest * * *."

¶ [0003] teaches:

> A knowledge sharing community generally, although not exclusively, comprises people with common areas of interest, common intents and purposes for sharing, and having a collectively accepted protocol for the form, structure and content of the knowledge that is shared between the members of the community, as well as the modes of interaction which would aid the process of sharing knowledge.

¶ [0003] teaches: "For example, a community of ophthalmologists * * *", and "whereas a community of Java developers * * *."

¶ [0017] teaches: "A typical large knowledge sharing community needs to be organized into a hierarchy of sub-communities for effective management of knowledge in various areas of interest or focus."

In contrast, in Ginn's method, members are grouped according to similarity of rating behaviors and differences computed therefrom. Ginn, entire Col. 8. Thus, Ginn fails to teach or suggest the member admission as recited in Claims 1-a, 38-a, and 59-a, so that the rejection of Claim 1 should be withdrawn.

**Other Recitations Concerning Communities**

Claims 1, 38 and 59 include recitations of other aspects of the invention relating to the concept of "community." For instance, see paragraphs d, e, g, h, I, j and k of Claims 1, 38 and 59. As just considered above, Claims 1, 38 and 59 define "community" or "sub-community" in a distinctly different way than does Ginn. This makes all the foregoing recitations of Claims 1, 38 and 59 distinguishable from Ginn. For instance, in Claims 1-i, 38-i and 59-i, "calculating an aggregate rating for a member in each *community* based on the contributions of the member to the *community*" (emphasis added) cannot be meaningfully compared to Ginn. As stated, this is because his concept "community" is distinctly different from that of Claims 1, 38 and 59.

Thus, each of the recitations of paragraphs d, e, g, h, I, j and k of Claims 1, 38 and 59 necessarily distinguish over Ginn. This justifies withdrawal of the rejection of these claims.

**Computing a Composite Rating Score for Each Asset**

Claim 1-h recites, "calculating a composite rating for knowledge assets based on an aggregation of ratings and usage over time of the knowledge assets in the community." Similar recitations appear in Claims 38-h and 59-h. Such calculation is not taught or suggested by Ginn, as the following explains.

Calculating a composite rating for knowledge assets as defined in Kochikar Claims 1-h, 38-h and 59-h is not the same as calculating the value of the message for the group in Ginn. Ginn Abstract. In the Ginn method, the value is merely the sum of all the ratings given to the message by users, does not change if no new ratings are given, and serves only to eliminate undesirable messages and provide incentives to users. In contrast, in a preferred embodiment of the claimed Kochikar approach, the value is a composition of the ratings given by users, ratings given by chosen reviewers, frequency of usage of the asset and the recency of such usage. Kochikar at ¶¶ [0063], [0064] and [0065] and Figure 5. In the claimed Kochikar approach, the value changes, for example on a daily basis, due to its usage or lack thereof. Kochikar at ¶¶ [0063] and [0065] and 5.5 and 5.7 in Fig. 5. The value is a realistic measure of the potential benefits of knowledge for the community (Kochikar at ¶¶ [0002] and [0019]) and of the benefits derived from knowledge contribution of the members (Kochikar at ¶¶ [0023] and [0082]). The value also helps to track the progress of knowledge management in the community. Kochikar at ¶¶ [0015], [0024], [0026] and [0082].

Accordingly, Claims 1-h, 38-h and 59-h patentably distinguish over Ginn. Moreover, dependent Claims 15, 89 and 100 further delineate preferred aspects of the calculating recitation of Claims 1-h, 38-h, and 59-h. These claims patentably distinguish with even greater force over Ginn, which teaches arriving at a distinctly different value for a distinctly different purpose.

**Cataloguing of Knowledge Assets**

Claim 1-c recites: "[C]ataloguing of knowledge assets at the time of submission to said repository for easy retrieval by classifying them against a multi-dimensional knowledge hierarchy, including the dimension of knowledge areas. Claims 38-c and 59-c have similar recitations. "Knowledge areas" are shown at, for instance, 2.4 in Fig. 2 of

Kochikar at 2.4. In a preferred embodiment, Kochikar shows in Fig. 2 at 2.4 a four-level hierarchy as discussed at ¶ [0052].

Kochikar ¶ [0052] – [0053] detail the cataloguing of knowledge assets in connection with Fig. 2. As mentioned above, Fig. 2 shows a multi-dimensional knowledge hierarchy for a knowledge asset, such as Content Types 2.1, Target Audience 2.2, Document Format 2.3, and Knowledge Areas 2.4.

In contrast, Ginn teaches at Col. 5, lines 1-6 and Col. 6, lines 40-56 the assigning by reviewers of a rating of appropriateness. A simple rating is "'Thanks A Lot,' 'Thanks,' and 'No Thanks,'" and a more nuanced rating is one where, for instance, "No Thanks" is divided into "'SPAM,' 'FLAME,' and 'FAQ.'" Ginn, Col. 6, lines 46-53. Notably, there is no rating for the "dimension of knowledge areas," as recited in Claim 1-c. SPAM is junk mail, such as advertising mentioned in Ginn at Col. 11, line 33; FLAME apparently means "inflammatory" (Ginn, Col. 11, line 33); and FAQ is a frequently asked question. These categories are not knowledge areas, relating instead, for instance, to the tone of a message or its commercial nature. This justifies withdrawal of the subject rejection.

Further, Ginn's ratings are one-dimensional, that is, they relate to the dimension of "appropriateness." Ginn, Claim 1, lines 49-54. In contrast, Claims 1-c, 38-c and 59-c recite "a multi-dimensional knowledge hierarchy." This also justifies withdrawal of the subject rejection.

Additionally, Claim 1-c recites "cataloguing of knowledge assets before publication." This is taught in Kochikar ¶ [0054] in connection with the flowchart of Fig. 3. Cataloguing of assets occurs in Step 3.1, and publication occurs only afterwards, in Step 3.4. Ginn, in contrast, teaches a classification scheme that necessarily occurs after publication. This can be seen by Ginn Claim 1, line 48 ("issuing the posted message to potentially interested users"), which is then followed by the evaluation steps of Claim 1, lines 53-54. This is because Ginn's classification is very different from the cataloguing of knowledge assets of Claims 1-c, 38-c and 59-c as discussed above. This distinction also justifies withdrawal of the subject rejection.

The independent Claims 1, 38 and 59 should be allowed based on any of the multiple grounds of distinction over the prior art mentioned above.

**Dependent Claims Define Additional Distinguishing Features**

The claims depending from independent Claims 1, 38 and 59 recite additional features distinguishing over the prior art. Applicants dispute any suggestion by examiner that the following claims define simple statistical techniques that would be apparent to persons of ordinary skill in the art: Claims 2, 4, 10, 13, 14-16, 18, 77-82, 103, 83, 84, 87-93, 94, 95, 98-102. As such, these claims distinguish over the prior art with even greater force than their base (independent) claims.

***Conclusion***

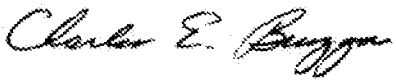
The pending claims should be allowed.

***Certificate of filing***

I certify that the foregoing document and any document(s) referenced below are being filed electronically with the USPTO using the private PAIR system on the date stated below.

Dated: September 26, 2008

Respectfully submitted,



Charles E. Bruzga
*Registration No.* 28,935
*Customer No.* 07617
*Tel.* (212) 269-1114
*Fax* (212) 943-1238
*Attorney Docket No.* 2639